

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Renaissance Mark
Attn: Philip Heyworth
3534 West Madison Street
Skokie, Illinois 60076

Application No.: 04090042

I.D. No.: 031288AJQ

Applicant's Designation:

Date Received: June 21, 2004

Subject: Flexographic Printing Facility

Date Issued:

Expiration Date:

Location: 3534 West Madison Street, Skokie

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of six flexographic printing presses and one plate making and one developing machine pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
 - ii. To limit the emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
2. This permit is issued based upon the flexographic printing presses not being subject to the VOM control requirements of 35 Ill. Adm. Code 218.401: Flexographic and Rotogravure Printing. This is consequence of the federally enforceable limitations of this permit limiting Potential to Emit and Maximum Theoretical Emissions of VOM to less than applicability threshold of 25 tons per year and 100 tons year, respectively, as established in Section 218.402(a).
 3. Plant-wide VOM emissions from six flexographic printing presses shall not exceed 3.0 tons/mo and 24.2 tons/year.

The VOM and HAP emissions shall be determined from the following equation:

$$E = \sum M_i \times V_i, \text{ where:}$$

- E - VOM emissions (tons);
- M_i - VOM-containing raw materials usage (tons);
- V_i - VOM content of raw materials (fraction).

These limits are based on the maximum production rate and VOM content of materials used. Compliance with annual limits shall be determined from running total of 12 months of data.

4. This permit is issued based on negligible emissions of volatile organic material from the plate making and film developing machines. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
5. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP) permit.
6. The Permittee shall maintain weekly records of the following items:
 - a. Amount of each VOM/HAP containing material used in the printing and clean-up operations (ton/wk, ton/yr);
 - b. VOM and HAP content of each VOM/HAP containing material used in printing and clean-up operations (weight percent);
 - c. Certified amount of waste shipped-off (ton/wk, ton/yr) and its VOM content (lb/gal);
 - d. VOM and HAP emission calculations (ton/wk, ton/yr).
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the

recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:VBJ:
cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the printing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons/year for volatile organic material (VOM), 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

Process	Emissions (tons/yr)		
	VOM	Single HAP	Total HAP
Printing Operations	24.5	<10	<25
Plate Making and Developing	0.44	--	--

VJB: